

# EXHIBIT LL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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 )  
IN RE: PROCESSED EGG PRODUCTS ) MDL No. 2002  
ANTITRUST LITIGATION ) 09-md-02002  
\_\_\_\_\_)  
 )  
THIS DOCUMENT RELATES TO: )  
 )  
The Kroger Co., et al. v. ) HIGHLY  
United Egg Producers, Inc., ) CONFIDENTIAL  
et al., No. 2:10-cv-06705 GP )  
\_\_\_\_\_ )

Denver, Colorado  
Wednesday, March 19, 2014

Videotaped 30(b)(6) deposition of:

VIRGINIA G. LITTLEFIELD

a witness herein, called for examination by counsel  
for Defendants in the above-entitled action before  
DEBBIE ZOETEWEEY, RMR, taken pursuant to Notice at  
the offices of Faegre Baker Daniels, 3200 Wells  
Fargo Center, 1700 Lincoln Street, Denver, Colorado  
80203, commencing at 9:21 a.m., when were present  
the following parties:

1 Colorado State University under Dr. Temple Grandin.

2 Q. And in what field was your master's?

3 A. Animal behavior and livestock handling.

4 Q. And in what year did you get your

5 bachelor's?

6 A. 1990.

7 Q. And in what year did you get your

8 master's?

9 A. I left graduate school in 2000.

10 Q. Do you have any other degrees or

11 professional certifications?

12 A. Yes. I'm certified by PACO, which is

13 the Professional Animal Auditor's Certification

14 Organization, and I'm certified to audit both

15 poultry and red meat.

16 Q. And does that include certification for

17 auditing egg-laying hens as well as boiler

18 chickens?

19 A. Yes.

20 Q. Now I'd like to go over a little bit of

21 your job history. When did you start working for

22 Safeway?

23 A. I started working for Safeway in 2000,

24 August of 2000.

25 Q. And where were you working before?

1           A.    I came directly from graduate school.

2           Q.    And when you started at Safeway, what  
3 was your position?

4           A.    I joined Safeway as the quality control  
5 coordinator.

6           Q.    And where were you located?

7           A.    In Centennial, Colorado.

8           Q.    And what were your roles and  
9 responsibilities as the quality control  
10 coordinator?

11          A.    I reviewed and filed claims with our  
12 vendors; I worked on editing specifications for  
13 products; reviewed and visited vendors for approval  
14 to supply Safeway meat.

15          Q.    And when you say you reviewed and filed  
16 claims, what kind of claims are you referring to?

17          A.    Product defects.

18          Q.    And until when were you in that  
19 position?

20          A.    Approximately 2002.

21          Q.    And in 2002, were you promoted or did  
22 you move to a different position?

23          A.    My position was eliminated and I moved  
24 to a pork buying position.

25          Q.    And what were your roles and

1 responsibilities in that position?

2 A. To procure pork, lamb and veal, sausage  
3 products for the Northwestern divisions of Safeway.

4 Q. And until when were you in that  
5 position?

6 A. Approximately 2005.

7 Q. And in 2005, what position did you  
8 transition into?

9 A. My current position became available  
10 and I was awarded that position.

11 Q. And what is your current position at  
12 Safeway?

13 A. I am the manager for the meat  
14 laboratory and animal welfare.

15 Q. And what are your roles and  
16 responsibilities as the manager for meat laboratory  
17 and animal welfare?

18 A. I manage the daily operations of our  
19 meat testing laboratory for tenderness; I'm also a  
20 responsible for auditing animal welfare for our  
21 vendors; and reviewing third-party audits as they  
22 are received from third-party auditing companies.

23 Q. And for what species are you in charge  
24 of auditing animal welfare standards?

25 A. Beef, pork, turkeys, and chickens.